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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

BRRAM, INC., ET AL.,	:	Civil Action No. 3:14-cv-02686 (JAP)
	:	
Plaintiffs,	:	
	:	
v.	:	Hon. Joel A. Pisano, U.S.D.J.
	:	Hon. Douglas E. Arpert, U.S.M.J.
UNITED STATES FEDERAL AVIATION	:	
ADMINISTRATION, ET AL.,	:	
Defendants.	:	DOCUMENT FILED ELECTRONICALLY

NOTICE OF MOTION FOR EXTENSION
BY CONSENT OF TIME TO RESPOND TO MOTIONS TO DISMISS
TO OCTOBER 22, 2014

To: Paul J. Fishman
United States Attorney
J. Andrew Ruymann
Assistant U.S. Attorney
402 East State Street, Room 430
Trenton, New Jersey 08608
Attorneys for the United States Federal Aviation Administration

and

John E. Flaherty
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Four Gateway Center
100 Mulberry Street
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Attorneys for Frontier Airlines, Inc.

and

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Paul R. Adezio
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Mercer County Counsel
640 McDade Administration Building
Trenton, NJ 08650
Attorneys for Mercer County Board of Chosen Freeholders

PLEASE TAKE NOTICE that on October 6, 2014, the undersigned attorney, on behalf of the plaintiffs, BRRAM, Inc., Ms. Holly Bussey, Mr. William Lynch, Mr. Richard DeLello, Ms. Julie Power, Mr. John Giacobetti, Mrs. Jenifer Giacobetti, Ms. Deborah Leamann, Ms. Caroline Bondi, Ms. Delores Brienza, and Mr. Richard Wayne, will move before the Honorable Joel A. Pisano, United States District Judge, United States District Court, at 402 East State Street, Trenton, New Jersey, for an order extending the time to respond to the three motions to dismiss the complaint filed by the defendants, United States Federal Aviation Administration, Frontier Airlines, Inc., and the Mercer County Board of Chosen Freeholders, to Wednesday, October 22, 2014. The above-named counsel for the defendants have consented to this motion. This motion is brought pursuant to the provisions of L. Civ.R. 7.1(d)(5).

In support of this motion, the plaintiffs will rely upon the Certification of R. William Potter. A form of Order is submitted along with this Notice of Motion.

Plaintiffs do not request oral argument.

Respectfully submitted,

/s/ R. William Potter

R. WILLIAM POTTER
Attorney for Plaintiffs

Dated: September 12, 2014.

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ADMINISTRATION, ET AL.,	:	
Defendants.	:	DOCUMENT FILED ELECTRONICALLY

CERTIFICATION OF R. WILLIAM POTTER IN SUPPORT OF
MOTION FOR EXTENSION BY CONSENT
OF TIME TO RESPOND TO MOTIONS TO DISMISS
TO OCTOBER 22, 2014

1. I am R. William Potter, Attorney at Law of the State of New Jersey, and counsel for the plaintiffs herein.
2. I make this certification in support of the motion for extension of the time for plaintiffs to respond to the three pending motions to dismiss the complaint to October 22, 2014.
3. I have communicated with each of the counsel for each of the defendants and have obtained their consent to this motion.
4. Due to increasing work load, counsel for the plaintiffs needs the additional time to respond to the three motions to dismiss the plaintiffs' complaint.

5. Since counsel for all of the defendants have consented to the 30-day time extension, there cannot be any prejudice to any party as a result of this time extension.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: September 12, 2014

/s/ R. William Potter

R. WILLIAM POTTER
Attorney for Plaintiffs

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UNITED STATES FEDERAL AVIATION	:	
ADMINISTRATION, ET AL.,	:	
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CERTIFICATE OF SERVICE

I hereby certify that the Notice of Motion for Extension by Consent of Time to Respond to Motions to Dismiss to October 22, 2014, Certification of R. William Potter, a proposed Order and this Certificate of Service were served upon all counsel of record via this Court's electronic case filing system on September 12, 2014.

/s/ R. William Potter

R. WILLIAM POTTER
Attorney for Plaintiffs

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UNITED STATES FEDERAL AVIATION	:	
ADMINISTRATION, ET AL.,	:	
Defendants.	:	DOCUMENT FILED ELECTRONICALLY

[PROPOSED] ORDER

This matter having been brought before the Court upon the Motion for Extension by Consent of Time to Respond to Motions to Dismiss to Wednesday, October 22, 2014, by the plaintiffs, BRRAM, Inc., et al., pursuant to L.Civ.R. 7.1(d)(5), with the consent of counsel for all defendants, and the Court having considered the matter,

It is this ____ day of _____, 2014, hereby

ORDERED that the Plaintiffs' Motion for Extension by Consent of Time to Respond to Motions to Dismiss to October 22, 2014, is hereby GRANTED.

JOEL A. PISANO
United States District Judge